

# **Exhibit B**

**quinn emanuel trial lawyers | new york**

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.  
**(212) 849-7080**

WRITER'S INTERNET ADDRESS  
**ericataggart@quinnemanuel.com**

April 25, 2013

**VIA E-MAIL**

Ian Boczeko  
Wachtell, Lipton, Rosen & Katz  
51 West 52nd Street  
New York, New York 10019

Re: LBHI v. JPMorgan: Side Letter to Protective Order Entered September 1, 2010

Dear Ian:

The following agreement between JPMorgan Chase Bank, N.A. ("JPMorgan"), Lehman Brothers Holdings Inc. ("LBHI") and the Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc. (the "Committee" and, together with JPMorgan and LBHI, the "Parties") supplements the Confidentiality Stipulation and Protective Order entered by Judge Peck on September 1, 2010 (the "Protective Order"). The Parties hereby agree through their undersigned counsel that the following language be added to the end of section 4 of the Protective Order:

For the avoidance of doubt, "outside consultants, financial advisors or experts retained for the purpose of assisting outside counsel of record who has appeared in the Litigation on behalf of a Party in the Litigation," under 4(k) shall include current JPMorgan and Lehman employees in their capacity as financial advisors to JPMorgan, LBHI or the Committee, and "counsel for the Parties to the Litigation" under 4(c) shall include outside counsel for the Parties, regardless of whether such outside counsel has appeared as counsel of record in this Litigation, provided that all such employees and counsel comply with the requirements of paragraph 12.

DATED: April 25, 2013

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By Erica P. Taggart  
Name: Erica P. Taggart  
Title: Partner  
Counsel for The Official Committee of Unsecured  
Creditors of Lehman Brothers Holdings Inc.

**Agreed and Accepted:**

DATED: April 29, 2013

WACHTELL, LIPTON, ROSEN & KATZ

By Ian Boozko  
Name: Ian Boozko  
Title: Partner  
Counsel for JPMorgan Chase Bank, N.A.

DATED: April 26, 2013

CURTIS, MALLET-PREVOST, COLT & MOSLE  
LLP

By Peter J. Behrke  
Name: Peter J. Behrke  
Title: Partner  
Counsel for Lehman Brothers Holdings Inc.